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15 *Attorneys for Defendants*

16 UNITED STATES DISTRICT COURT
17
18 DISTRICT OF ARIZONA

19 TRAVELERS PROPERTY CASUALTY
20 COMPANY OF AMERICA, a
21 Connecticut corporation,
22
23 Plaintiff,

24 -vs-

25 AMERICAN PONY EXPRESS, INC., An
26 Arizona corporation; ARIZONA TAXI
MANAGEMENT, LLC, an Arizona
limited liability company; and VIP TAXI
LLC., an Arizona limited liability
company,
Defendants.

**DEFENDANTS' JOINT
NOTICE OF REMOVAL
(Pima County Superior Court
Civil Case No. C20183791)**

THE REMOVAL REQUIREMENTS HAVE BEEN SATISFIED

8. In accordance with 28 U.S.C. § 1446(a) and L.R.Civ. 3.6, Defendants attach to this Notice of Removal copies of all process, pleadings and orders filed to date in CV20183791.

9. Removal here is timely pursuant to 28 U.S.C. § 1446(b)(3) and L.R.Civ. 3.6 because the case stated by the initial pleading in the State Court action was not removable, and this *Notice* is filed within thirty days after receipt by the Defendant of a paper (the Complaint) from which Defendants were first able to ascertain that the case is one which is removable.

10. The *Complaint* at issue here contains a cause of action (breach of contract) that is subject to the jurisdiction of this Court.

11. Removal is not premature because Defendants were served with the Complaint in this venue, and their response is this *Notice* now timely before this Court, and they have not waived any available defenses at law and in equity.

12. This Court has original jurisdiction of this matter based on complete diversity jurisdiction pursuant to 28 U.S.C. §§1332(a) and 1441(b).

13. The District of Arizona is the United States District embracing Pima County, Arizona, the county in which the State Court action is pending, as specified in 28 U.S.C. § 112(a). Therefore, this Court is the proper District Court to which the pending State Court action should be removed pursuant to 28 U.S.C. § 1441(a).

14. Pursuant to 28 U.S.C. § 1446(d), Defendants, as the removing party, will promptly notify all parties in writing of the filing of this Notice of Removal and will promptly file a copy of this Notice of Removal with the Clerk of the Superior Court in the State of Arizona, Pima County, where the State Court action is currently pending.

15. Defendants are all Arizona citizens and Plaintiffs are Connecticut citizens.

Dated: August 30, 2018. MESCH CLARK ROTHSCHILD

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